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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

2-WAY COMPUTING, INC.,

Plaintiff,

vs.

AT&T MOBILITY LLC and AT&T
MOBILITY II LLC,

Defendants.

Case No. 2:15-cv-02230-GMN-(CWH)

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
FILE PROPOSED PROTECTIVE
ORDER**

(First Request)

Plaintiff 2-Way Computing, Inc. ("2-Way") and Defendants AT&T Mobility LLC and
AT&T Mobility II LLC (collectively, "ATTM") by and through their counsel, hereby file this

1 Stipulation and [Proposed] Order to Extend the Deadline to File Proposed Protective Order. This
 2 request complies with Local Rules 6-1, 6-2, and 7-1. The litigation of this matter will be best
 3 served by the proposed extension. This is the first request to extend this deadline. This request is
 4 not made after the deadline.

5 On April 26, 2016, the Court entered the Discovery Plan and Scheduling Order in this
 6 matter, ECF No. 44, setting April 27, 2016 as the deadline for the parties to file a proposed
 7 protective order. The parties agree that a two-week extension of the proposed protective order
 8 deadline, to May 11, 2016, will permit the parties time to resolve any initial disagreements
 9 regarding the language of the proposed protective order and work toward submitting an agreed
 10 proposed order to the Court.

11 Accordingly, Plaintiff and Defendants respectfully request that the Court grant this request
 12 to continue the deadline to file a proposed protective order.

13 DATED: April 27, 2016

14 Respectfully submitted,

15 **RUSS, AUGUST & KABAT**

**KILPATRICK TOWNSEND &
STOCKTON LLP**

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Counsel for Defendants

AT&T Mobility LLC and AT&T Mobility II LLC

ORDER

IT IS SO ORDERED.

DATED: April 28, 2016



United States Magistrate Judge

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO FILE PROPOSED PROTECTIVE ORDER** by the method indicated:

_____	U.S. Mail
_____	U.S. Certified Mail
_____	Facsimile Transmission
_____	Overnight Mail
_____	Federal Express
_____	Hand Delivery
<u> X </u>	Electronic Filing/ECF

and addressed to the following:

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DATED: April 27, 2016

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